

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LONNIE RANDOLPH,)	
individually and on behalf of the classes)	
defined herein,)	
)	
Plaintiff,)	
)	
v.)	1 : 08 CV 3212
)	Judge Castillo
CROWN ASSET MANAGEMENT, LLC,)	Magistrate Judge Brown
)	
Defendant.)	

NOTICE OF FILING

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that, on August 6, 2008, we filed with the Clerk of the United States District Court for the Northern District of Illinois the following document, copies of which are attached and are hereby served upon you: **EXHIBIT A** and **EXHIBIT B** to Plaintiff's Complaint. The filing of these exhibits is to correct the omission of these documents from the ECF filing of Plaintiff's Complaint due to clerical error.

s/ Thomas E. Soule
Thomas E. Soule

Daniel A. Edelman
Cathleen M. Combs
James O. Lattuner
Thomas E. Soule
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC
120 South LaSalle Street, Suite 1800
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)

CERTIFICATE OF SERVICE

I, Thomas E. Soule, hereby certify that on August 6, 2008, a copy of the attached documents were filed electronically with the Court, and that a copy was sent by electronic mail to the following persons on the same date:

Todd P. Stelter
Hinshaw & Culbertson LLP
222 N. LaSalle St., Ste 300
Chicago, IL 60601
tstelter@hinshawlaw.com

s/ Thomas E. Soule
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120 South LaSalle Street, Suite 1800
Chicago, Illinois 60603
(312) 739-4200
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

CROWN ASSET MANAGEMENT, LLC
Plaintiff

vs.

LONNIE RANDOLPH

Defendant

No. 08-111 184628

Return Date: MAY 22 2008

contract

Amount claimed: \$12,602.69

Plus court costs

COMPLAINT

NOW COMES the Plaintiff, by and through its attorneys, Blitt and Gaines, P.C., and complaining of the Defendant(s), states as follows:

1. The Defendant(s) utilized a charge account and/or line of credit issued by Plaintiff or its assignors whereby Defendant(s) could charge goods and services to their account and/or receive cash advances.
2. The Defendant(s) subsequently defaulted by failing to pay for the indebtedness incurred resulting in the balance due Plaintiff of \$12,602.69.
3. Due demand has been made on the Defendant(s) to pay this amount and the Defendant(s) have failed to do so.

WHEREFORE, Plaintiff prays for judgment against the Defendant(s) in the amount of \$12,602.69 plus interest and court costs.

Blitt and Gaines, P.C.
Attorney for Plaintiff
661 Glenn Avenue
Wheeling, IL 60090
(847) 403-4900
328878

This is an attempt to collect a debt and any information will be used for that purpose.

07-57867-0
3873-00



REDACTED

BUSINESS RECORDS AFFIDAVIT

COUNTY OF GWINNETT }
 } SS
 STATE OF GEORGIA }

Account Debtor: RANDOLPH, LONNIE
 Account #: [REDACTED]
 Balance Due: \$12,602.69

CROWN ASSET MANAGEMENT, LLC

VS.

~~RANDOLPH, LONNIE~~

Personally appeared before the undersigned officer, duly authorized by law to administer oaths, Leigh Suttlemyre, who, after first being duly sworn, deposes and states that he/she has personal knowledge of the following facts and that they are true and correct:

I am the Legal Services Manager for Crown Asset Management, LLC, a Georgia Limited Liability Corporation with offices located at 3355 Breckinridge Blvd Ste 132, Duluth GA 30096-4989 ("Crown").

Crown is the holder in due course and assignee of the above-referenced account that originated with Bank of America, NA.

Based upon information currently available, the principal balance amount stated above is true and accurate and has not been paid by the account debtor as of the time of forwarding this account.

There has been no final judgment entered by a court of competent jurisdiction disallowing any or all of the account balance.

Based upon information currently available, the account debtor is not protected under a Bankruptcy filing.

Based upon information currently available, the account debtor has not been released from liability on the debt.

Based upon information currently available, the account has not been the subject of fraud.

Based upon information currently available, the account debtor is not deceased.

Based upon information currently available, there is no dispute, claim, action, suit, or proceeding pending or threatened with respect to the account.

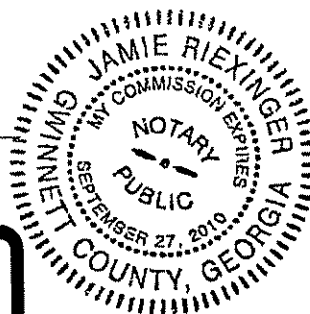
FURTHER AFFIANT SAYETH NOT.



LEIGH SUTTLEMYRE
 LEGAL SERVICES MANAGER
 CROWN ASSET MANAGEMENT, LLC

Sworn to and subscribed before me this
 18 day of Dec, 2007.


 NOTARY PUBLIC
 My Commission expires: 09-27-10



IL168



Crown Asset Management, LLC
Statement of Account

Crown File Number:	405986
Primary Debtor Name:	RANDOLPH, LONNIE
Primary Debtor Home Address:	[REDACTED]
	CHICAGO, IL [REDACTED]
Additional Debtor Name:	
Original Lender:	Bank of America, NA
Original Lender Account Number:	[REDACTED]
Alternate Lender Account Number:	[REDACTED]
Account Open Date:	06/08/1999
Original Lender Charge-off Date:	10/09/2005
Date of Last Payment to Original Lender:	03/05/2007
Date of Last Payment to Crown Asset Management, LLC:	
Account Purchase Date by Crown Asset Management, LLC:	07/25/2007
Principal Balance Due:	\$ 5,754.17
Interest Amount Due:	\$ 0.00
Total Amount Due:	\$ 12,602.69

NOTE: Crown Asset Management, LLC created this statement using data provided by the original creditor or prior owners of the account and does not intend to imply that the originating creditor participated in the creation of this statement.